



TUDOR RANCH, Inc.

Table Grapes

November 23, 2005

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RECEIVED

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs, AMS, USDA
1400 Independence Ave, SW
Stop 0237
Washington, DC 20250

Dear Sir or Madam:

Re: Docket No. FV03-925-1PR
Federal Register Notices of May 25, 2005, p. 30001; July 25, 2005, p. 42513; and September 27, 2005, p. 56378

We are writing in support of the proposed change of the regulatory period for table grapes to April 1-July 10.

We can see no reason for allowing substandard foreign products to undermine domestic production by being permitted to enter the United States with quality standards lower than those imposed on domestic production.

We believe this change will in no way curtail the amount of Chilean exports to the U.S., because Chile has shown it is capable of exporting quality product when it is required to do so. Therefore, this change should have no effect on the economy of the U.S. ports currently handling shipments of Chilean grapes. Moving the beginning of the marketing order period to April 1 merely requires that the Chilean grape industry provide the same amount of caution in selecting its grapes for export to the United States as it does now on April 20.

It has taken the Coachella Valley Growers many years to establish ourselves as quality growers and shippers of table grapes, and we have accomplished this by imposing strict standards upon ourselves.

Although it has been very tough to meet the competition of the Chilean industry, our comments are not aimed at stopping or restricting imports of competing commodities. We ask only that imported table grapes be required to meet the same standards for consumer satisfaction as those imposed on domestic production. The number of Coachella growers has dwindled considerably over the last twenty years, and we believe the principal cause is the impact of substandard imported table grapes, which do not meet our standards. Many arrive just prior to our production and harvesting, and when the quality is bad, consumers do not buy and growers lose money and many lose their incentive to stay in production.

November 23, 2005

As you are aware, the law provides for extension of the marketing order when imports circumvent the grade, size, quality or maturity standards established under the order. The July 25 proposed rule complies with this provision of law.

Sincerely,

A handwritten signature in black ink, appearing to read "Marion Tudor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marion Tudor
Owner, Tudor Ranch Inc.

A handwritten signature in black ink, appearing to read "Vladimir Tudor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Vladimir Tudor
Owner, Tudor Ranch Inc.